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EXECUTIVE SECRETARY
OFFICE OF THE
REGULATORY AUTH.
REC'D TN

January 2, 1998

K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

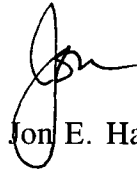
**Re: Application for Electric Power Board of Chattanooga for a Certificate
of Public Convenience and Necessity to Provide Intrastate
Telecommunications Services
Docket No. 97-07488**

Dear David:

Enclosed please find an original and thirteen (13) copies of a Petition of MCI
Telecommunications Corporation For Leave to Intervene in the above-referenced docket.
Copies have been served on all parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC



Jon E. Hastings

JEH/sja
Enclosures

BEFORE THE TENNESSEE REGULATORY AUTHORITY

In re: Application for Electric Power Board of Chattanooga for Certificate of Public Convenience and Necessity to Provide Intrastate Telecommunications Services

Docket No. 97-07488

PETITION OF MCI TELECOMMUNICATIONS CORPORATION FOR LEAVE TO INTERVENE

MCI Telecommunications Corporation ("MCI"), pursuant to Tennessee Code Annotated Section 4-5-310, petitions the Tennessee Regulatory Authority (the Authority) for leave to intervene in the above-referenced proceeding and participate as its interests may appear and in support of its Petition, states as follows:

1. MCI is a Delaware corporation authorized to do business in the State of Tennessee, operating as an interexchange carrier under a Certificate of Public Convenience and Necessity. As a holder of such certificate, MCI has legal rights, duties, privileges, immunities and other legal interests that will be affected by and determined in the above-captioned proceeding.

2. The Electric Power Board of Chattanooga ("EPB") is a provider of electric power at retail to both business and residential customers in the City of Chattanooga, most of Hamilton County, Tennessee and parts of Bledsoe, Bradley, Marion, Rhea and Sequatchie Counties in Tennessee. The facilities used to provide such electric power are being paid for, or have been paid for, through the revenues generated as a monopoly electric provider. These facilities will most certainly be utilized to provide the telecommunications services the EPB desires to seek pursuant to its application in this docket. MCI is presently seeking to enhance and increase its provision of telecommunications services in these same areas of the State of Tennessee. To do so, MCI must build or purchase systems and facilities. MCI's ability to compete effectively in

these markets will depend on safeguards and conditions imposed on the EPB to ensure the avoidance of cross-subsidization of the EPB's proposed telecommunications services by its existing electric service and facilities providing such service.

3 As a certificate holder, Petitioner's legal rights, duties, privileges, immunities, and other legal interests will be determined and affected by the above-referenced proceedings.

4 The legislatively-declared telecommunications services policy of the State of Tennessee is to:

foster the development of an efficient, technologically advanced, statewide system of telecommunications services by permitting competition in all telecommunications services markets, and by permitting alternative forms of regulation for telecommunications services and telecommunications services providers. To that end, the regulation of telecommunications services and telecommunications services providers shall protect the interests of consumers without unreasonable prejudice or disadvantage to any telecommunications services provider, universal service shall be maintained; and rates charged to residential customers for essential telecommunications services shall remain affordable.

T.C.A. § 65-4-123.

The making or giving by the EPB as a public service company, of an undue or unreasonable preference or advantage to any particular person, or any particular descriptions of traffic or service, or to subject any particular person, company, firm or corporation or any particular descriptions of traffic or service to any undue or unreasonable prejudice or disadvantage, is unlawful. See, T.R.A. §65-4-122. The Application of the EPB for a Certificate of Public Convenience and Necessity to Provide Intrastate Telecommunications Services must contain adequate safeguards so as to avoid any such undue or unreasonable preference or advantage by EPB. MCI, as a certificate holder in Tennessee, seeks intervention in this proceeding to examine and review the proposed Certificate of Public Convenience and Necessity

of the EPB and the facts surrounding the proposed telecommunications activities to be offered pursuant to that requested Certificate.

5. MCI seeks intervention in this proceeding in order to monitor the proposed Certificate of Public Convenience and Necessity of the EPB. MCI understands proceedings in this docket have commenced. MCI, by its Petition to Intervene, does not seek to delay or hinder the present schedule on which the parties to this docket are proceeding.

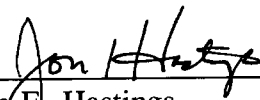
6. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention of Petitioner. Petitioner seeks to intervene and participate as its interests may appear.

7. This Petition to Intervene is being filed at least seven (7) days before the hearing of this cause.

WHEREFORE, PREMISES CONSIDERED, MCI Telecommunications Corporation prays that it be granted leave to intervene and participate in this proceeding with all attendant rights and responsibilities and to receive copies of any notices, or orders, or any other dockets filed herein, and to have such other, further and general relief as the justice of its causes may entitle it to receive.

Dated this 2nd day of January, 1998.

Respectfully submitted,



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Attorneys for MCI Telecommunications Corporation

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following persons on this the 2nd day of January, 1998.

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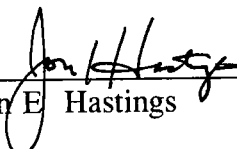
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